

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MEGHAN ABBOTT,

Plaintiff,

v.

WELSPUN INDIA LTD., and WELSPUN USA
INC.,

Defendants.

Case No. 1:16-cv-06792-RJS-DCF

ECF Case

CLASS ACTION

**DECLARATION OF BRUCE W. STECKLER IN SUPPORT OF THE JOINT
APPLICATION OF HAGENS BERMAN AND STECKLER GRESHAM COCHRAN
PLLC TO BE APPOINTED INTERIM CO-LEAD COUNSEL**

I, BRUCE W. STECKLER, declare as follows:

1. I am a member of the law firm of Steckler Gresham Cochran, PLLC, one of the counsel of record for Elise Aasgaard in *Aasgaard, et al. v. Welspun USA, Inc.*, (E.D. Mo.) Case No. 16-cv-1408. I am a member of the state bars of Texas, Louisiana, New York, Pennsylvania, and Missouri and a member of good standing in the Southern District of New York. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. True and correct information on our law firm and attorneys is contained on our website at www.stecklerlaw.com in accordance with State Bar requirements. Attached is a true and correct copy of the following document:

Exhibit A: Bruce W. Steckler resume

3. Counsel for the Aasgaard plaintiffs agreed to support the leadership team set forth in the Joint Application for Appointment of Hagens Berman and Steckler Gresham Cochran as co-lead counsel.

in the *Aasgaard* case in which we have interviewed multiple Plaintiffs and consulted with an expert familiar with the textile industry in the United States and India.

5. Proposed Interim Co-Lead Counsel agreed to share fees based on actual work performed to benefit the putative class.

6. Proposed Interim Co-Lead Counsel and the PEC agreed to split costs equally.

7. These same terms were offered to counsel for Plaintiff Brower, but they refused to accept these terms unless they were guaranteed 25% of any recovery notwithstanding the amount and quality of their work.

8. I have worked with the Hagens Berman and McCune Wright LLP in the past and am familiar with each respective firm's attorneys, work product, and success.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 9th day of December 2016, at Dallas, Texas.

s/ Bruce W. Steckler
BRUCE W. STECKLER

CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2016, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

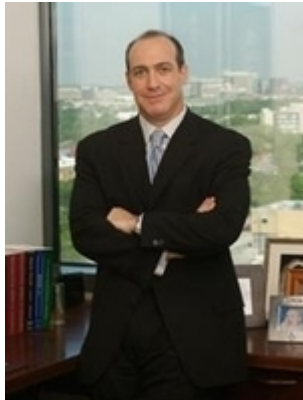
s/ Bruce W. Steckler
BRUCE W. STECKLER

EXHIBIT A



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PROFESSIONAL BIOGRAPHY

Bruce W. Steckler founded Steckler Gresham Cochran, PLLC after two decades of successfully litigating a variety of commercial, securities, mass tort, products liability, consumer, personal injury, and first party insurance cases. He envisioned a law firm where attorneys and employees garnered the trust and full confidence of clients. Today, he has formed a practice which provides unparalleled client service and personal attention to the needs and objectives of its clients.

He was a partner at three Dallas-based firms and, most recently, was a shareholder and the head of the General Litigation Section of one of the largest plaintiffs firms in the United States. He is known as an aggressive advocate willing to take innovative approaches to achieve success for his clients. His legal acumen has won him recognition by D Magazine's "Best Lawyers under 40" feature in 2002 through 2006, and D Magazine's "Best Lawyers" in 2009 through 2016, and Thompson Reuters as a "Texas Super Lawyer" in 2004 through 2016. Mr. Steckler enjoys an "AV Preeminent" rating by Martindale-Hubbell Law Directory, its highest peer rating. He was selected for the Plaintiff's Hot List in 2011 by the National Law Journal. He was named a finalist for Public Justice Trial Lawyer of the Year 2012, an honor that is awarded to the attorneys who "made the greatest contribution to the public interest within the past year by trying or settling a precedent-setting or socially significant case." He has also been named one of the "Top 100 Trial Lawyers" by the National Trial Lawyers from 2013 through 2016, was named a "2015 Top Rated Lawyer in Insurance Law" by American Lawyer Media and Martindale-Hubbell Law Directory, and Top 100 Trial Lawyers in America in 2015.

In law school, Mr. Steckler was the Leading Articles Editor of the Journal of Air Law & Commerce, a recipient of the Journal's scholarship, a member of the SMU Law Review Association, and a board member of the law school's Moot Court program. He was appointed by the State Bar of Texas to serve as a member of the State Bar of Texas Grievance Committee and currently serves as an Emeritus member of the Board of Directors of the Dallas Trial Lawyers Association. He received a Certificate of Appreciation in 1996 from the Dallas Bar Association for his pro bono work in the community. He has authored numerous papers on civil litigation and trial practice and has spoken at several seminars on various civil litigation topics before attorneys, professionals, and the insurance industry. Bruce is a member of the Public Justice Foundation, American Association of Justice, Dallas Trial Lawyers Association, and has been admitted to the Million Dollar Advocate Group.

Mr. Steckler has been appointed by both federal and state court judges to lead some of the most significant cases in the United States. He was appointed by the Honorable Eldon Fallon in the United States District Court for the Eastern District of Louisiana to serve on the Plaintiffs' Steering Committee for the Chinese Drywall MDL and served as a member of the Plaintiffs' Executive Committee for Bank Overdraft Litigation appointed by the Honorable Lawrence King in the United States District Court for the Southern District of Florida. He was co-lead counsel in the case against JP Morgan Chase in *In Re Checking Account Overdraft Litigation*. Most recently, Mr. Steckler was appointed by the Honorable Judge Douglas P. Woodlock to serve as a member of Plaintiffs' Steering committee for MDL 2428: *In Re: Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation* in the United States District Court for Massachusetts. He also was recently appointed by the Honorable Judge Kenneth M. Karas in United States District Court for the Southern District of New York to serve on the Plaintiffs' Steering Committee for the *In re: Ford Fusion and C-Max Fuel Economy Litigation*. He was appointed lead counsel by the Honorable Judge Anthony Battaglia in the *In Re: Easysaver Rewards Litigation* in the Southern District of California. He serves as liaison counsel and lead counsel in *In Re: Texas State Silica Products Liability Litigation*. He is a member of the State Bars of Texas, Louisiana, New York, Pennsylvania and Missouri, U.S. District Courts – Northern District of Texas, Eastern District of Texas and Southern District of Texas, Eastern District of Louisiana and Western District of Louisiana, United States Court of Appeals for the Ninth Circuit, and the Federal Court of Claims in Washington, D.C.

Representative Experience

BANK OVERDRAFT LITIGATION

Bruce W. Steckler was part of Plaintiffs' Executive Committee for Bank Overdraft Litigation MDL (*In Re: Checking Account Overdraft Litigation*; MDL No. 2036), appointed by the Honorable James Lawrence King of the United States District Court for the Southern District of Florida, that held some of the country's largest banks accountable for a practice which charged consumers unfair fees when they overdrafted their checking accounts. This litigation resulted in significant settlements, with JPMorgan Chase paying out \$110 million and Bank of America paying out \$410 million. Mr. Steckler was co-lead counsel in the case against JP Morgan Chase. His work in these cases allowed him to be nominated for the 2012 Trial Lawyer of the Year Award by the Public Justice Foundation.

PHARMACEUTICAL/ PRODUCTS LIABILITY LITIGATION

Bruce W. Steckler was appointed to Plaintiff's Steering Committee for the *In Re Fresenius Granuflo/Naturalyte Dialysate products liability litigation* and the *In Re Ford Fusion and C-Max Fuel Economy litigation*. These cases are currently ongoing. In addition, Bruce Steckler serves as lead Texas Counsel for

the defense of product liability litigation for a large dietary supplement manufacturer. He has successfully prosecuted and defended products liability cases ranging from dangerous pharmaceuticals to advising corporate general counsels on defending frivolous claims.

CHINESE DRYWALL LITIGATION

Bruce W. Steckler was appointed to the Plaintiffs' Steering Committee for the Chinese Drywall MDL (In Re: Chinese-Manufactured Drywall Products Liability Litigation, MDL No. 2047) by the Honorable Eldon E. Fallon of the United States District Court for the Eastern District of Louisiana that obtained a groundbreaking settlement with KNAUF Plasterboard Tianjin, a prominent Chinese drywall manufacturer, as well as three major suppliers and some of the largest insurance companies in the United States. The total value of the settlement is estimated to be over \$1.1 billion. This settlement helped thousands of homeowners whose properties were affected by defective drywall, which was linked to adverse health effects and metal corrosion after only three years from the inception of the litigation. It is one of the first settlements in the United States by consumers against a Chinese manufacturer.

CONSUMER PROTECTION CASES

Bruce W. Steckler was appointed co-lead counsel in In Re EasySaver Rewards Marketing and Sales Practices Litigation, MDL No. 2161, and obtained a proposed \$38 million settlement with a company that runs a number of retailing websites including Proflowers.com. The case claimed that consumers who made purchases through the sites were charged membership fees without their knowledge or consent. He also served as lead co-counsel and obtained a potential settlement in Cox, et al. v. Clarus Marketing Group, LLC and Provide Commerce, Inc., Cause No.11-cv-02711-H, in the United States District Court for the Southern District of California, regarding an online shipping scam.

OCCUPATIONAL AND PERSONAL INJURY CASES

Bruce W. Steckler has litigated cases in Louisiana against major corporations on behalf of individuals injured by occupational noise-induced hearing loss. During the course of his career, he has aggressively represented individuals harmed by noise in various industries in Louisiana. This work has helped shape the law in Louisiana and, as a result, he has reached historic settlements with over eight major national corporations in Louisiana representing a variety of industries. Bruce W. Steckler serves as liaison counsel and co-lead counsel in In Re: Texas State Silica Products Liability Litigation, Master Docket 2004-70000, where he has represented individuals injured by silica exposure. He has handled a number of silica cases over the course of his career. Most notably, he represented a sandblaster who developed silicosis and scleroderma from silica exposure obtaining a settlement of over \$2 million. Bruce W. Steckler has handled,

tried and settled numerous medical malpractice, trucking and personal injury cases during the course of his career. In many instances, he achieved several million dollar settlements in personal injury cases for which he was recognized by Million Dollar Advocate Forum.

FIRST-PARTY INSURANCE CASES

Bruce W. Steckler has been retained by businesses, homeowners, cities, and school districts in claims against their insurance carriers for bad faith and failure to adequately adjust claims following natural disasters. These representations have provided the firm with insight into the insurance industry and its practices and provided much needed recoveries, so that his clients are not victimized twice. Some representative clients in these insurance actions include The City of Pasadena, Texas; LaPorte Independent School District; and Barber's Hill Independent School District in their hurricane Ike claims where Bruce W. Steckler was able to obtain significant recoveries for these entities.

SECURITIES/ANTI-TRUST LITIGATION

Bruce W. Steckler has worked on several notable securities cases in Texas. He was appointed as lead local counsel in two shareholder class actions in In Re: Electronic Data Systems Class Action Litigation; Cause No. 366-01078-2008, filed in the 366th Judicial District Court of Collin County, Texas, regarding the sale of Electronic Data Systems (EDS) to Hewlett-Packard. This suit resulted in better prices for EDS shareholders. Bruce W. Steckler was also lead local counsel in City of St. Clair Shores Police and Fire Retirement System, Individually and on Behalf of All Others Similarly Situated v. Affiliated Computer Services, Inc., et al; Cause No. CC-09-07377-C, filed in County Court at Law No. 3 for Dallas County, Texas and, in concert with another firm, obtained \$69 Million for ACS public shareholders. Bruce W. Steckler also has worked on anti-trust litigation and most recently, in connection with another firm, represented the Port of Galveston and the Port of New Orleans in In Re Marine Fender's Antitrust Litigation; Cause No. 2:10-cv-02319-VBF-RC; filed in the United States District Court for the Southern District of California, which resulted in a settlement with many of the Defendants. He also represented individuals in the In Re: Musical Instruments and Equipment Antitrust Litigation; Cause No. 3:10-cv-00103-LAB-POR, filed in the United States District Court for the Southern District of California.

RECENT NEWS ARTICLES

- Bruce Steckler interviewed about a construction defect case in Willacy County
KGBT Action 4 News - May 8, 2014
- Security Vendor Trustwave Named in US Target-Related Suit
ComputerWorld.com.au - March 26, 2014

- Chicago's Trustwave Sued Over Target Data Breach
ChicagoBusiness.com - March 25, 2014
- Target, Security Auditor Trustwave Are Sued Over Data Breach
Reuters.com - March 26, 2014
- Trustwave Sued By Banks Over Target Hack -- Report
CNet.com - March 26, 2014
- Banks Sue Security Vendor Trustwave After Target Data Breach
Bank Technology News - March 26, 2014
- City and Attorneys Split Lawsuit Settlement
The Pasadena Citizen - October 7, 2013
- Judge Approves 5 Class-Action Settlements in Chinese Drywall Case
Washington Post - February 07, 2013
- Coupon No Bar to Web Merchant Settlement Where Cash Reimbursement Also Offered
Bloomberg Law - February 06, 2013
- PMC Settles Shareholder Suit Over \$2.4B REIT Merger
Law360 - January 29, 2014
- Class Action Lawsuit Alleging "Deceptive Trade Practices" Filed Against U.S. Money Reserve, Inc.; Fidelity Gold & Bullion, LLC
PRWeb – August 31, 2016
- Steckler LLP Secures Victory for Defense in Dietary Supplement Lawsuit
PRWeb – January 28, 2016
- Hybrid Drivers Parse Ford Ads to Keep Fuel Fraud Suit Alive
Law360- May 5, 2016

BAR AND COURT ADMISSIONS

- Texas – 11/6/1992
- Louisiana – 5/5/2011
- Pennsylvania – 6/25/2010
- New York – 9/30/2010
- Missouri – 8/5/2011
- United States Court of Federal Claims
- United States District Courts for the Northern District of Texas
- United States District Courts for the Southern District of Texas
- United States District Courts for the Eastern District of Texas
- United States District Courts for the Western District of Texas
- United States District Courts for the Eastern District of Louisiana
- United States District Courts for the Western District of Louisiana
- United States District Courts for the Southern District of New York
- United States District Courts for the Southern District of California
- United States Court of Appeals for the 9th Circuit

RECOGNITIONS

- Peer-rated AV Preeminent (5.0 out of 5.0) by Martindale-Hubbell
- Selected to serve as member of the State Bar of Texas Grievance Committee, District 6A
- Selected for Texas Super Lawyers by Thompson Reuters and published in Texas Monthly (2004-2016)
- Selected by D Magazine as one of the “Best Lawyers in Dallas under 40” (2002-2006)
- Selected by D Magazine as one of the “Best Lawyers in Dallas” (2009-2016)
- Selected for Top 100 Trial Lawyers by the National Trial Lawyers (2013-2016)
- Selected for Plaintiff's Hot List by the National Law Journal (2011)
- Finalist for Public Justice Trial Lawyer of the Year (2012)
- Selected as one of Texas' Top-Rated Lawyers by Legal Leaders (2014)
- Selected for 2015 Top Rated Lawyer in Insurance Law by American Lawyer Media and Martindale-Hubbell and published in The American Lawyer, Corporate Counsel, and National Law Journal (2015)
- Selected for 2016 America's Top 100 Lawyers (2016)

EDUCATION

- Southern Methodist University–Dedman School of Law (J.D. 1992)
- Southern Methodist University Law Review Association, 1992
- Journal of Air Law & Commerce, Leading Articles Editor, 1991-1992
- Moot Court Board Member
- Tufts University (B.A., magna cum laude, 1989)
- Varsity Letterman Football
- 1986 NESCAC Champions

PROFESSIONAL ASSOCIATIONS

- American Association for Justice
- Dallas Trial Lawyers Association
- Dallas Trial Lawyers Association Board of Directors (2006-2010)
- Dallas Bar Association
- Emeritus Board of Directors (2010-2014)

PRESENTATIONS

Mr. Steckler is a bar association member and, due to his breadth of experience in the legal field, serves as a speaker and author on pressing legal topics. Although nationally recognized for his work, his commitment continues to remain with his clients, to whom he provides sound legal experience, well-crafted negotiation skills and proven courtroom tactics. He is proud of his landmark victories and his ability to provide clients with hands-on, personal attention - and most importantly - respect.

- “Value Proposition of Going to Trial,” Texas Lawyer General Counsel Seminar, Dallas, Texas, October 16, 2014.
- Granuflo Medical Prosecution, American Association for Justice, Baltimore, Maryland, July 29, 2014.
- “Chinese Drywall Insurer,” HB Litigation Conference, Miami, Florida, November 2011
- “Chinese Drywall Litigation – What is it?,” Advanced Insurance Law, State Bar of Texas, Dallas, Texas, April 9, 2010.
- Co-Chair, “Chinese Drywall Litigation,” HB Litigation Conferences, New Orleans, Louisiana, June 18, 2009.
- “Hurricane Insurance Litigation,” Galveston Hoteliers and Lodging Association, February 10, 2009.
- “Toxic Tort Litigation and the Effects of Tort Reform,” State Bar of Texas (Webcast), 2006.
- “Medical Malpractice,” American Urological Association Meeting, San Antonio, Texas, 2005.
- Co-Chair, “Silica 101,” HarrisMartin, Houston, Texas, 2005.
- “Silica Premises Liability Claims,” Mealey’s Silica Conference, New Orleans, Louisiana, 2004.
- “An X-rated Version of Medical Malpractice,” Southwest Urological Society Meeting, Boston, Massachusetts, 2003.
- “HIPAA Compliance for Health Care Providers,” Radiology Business Management Association, Texas Chapter, Fall Meeting, November 10, 2000.
- “HIPAA Compliance for Health Care Providers,” D.R.S. Seminar, November 7, 2000.
- “Filing and Challenging the Section 13.01 Expert Report,” St. Mary’s – Texas Tech Schools of Law Medical Malpractice Conference, November 3, 2000.
- “HIPAA: The Future of Privacy and Confidentiality in Health Care,” State Bar of Texas and Texas Hospital Association: 2000 Health Law Conference, October 30, 2000.
- “E-Health Commerce: HIPAA Health Care Fraud and Abuse,” HIPAA Compliance for Health Care Providers seminar sponsored by Medical Business Institute (MBI) and Vinson & Elkins, L.L.P., July 26, 2000.

PUBLICATIONS

- Co-Author, “Critical Placental Pathology Issues to Consider in Obstetrical Malpractice Cases,” Association of Trial Lawyers of American National College of Advocacy Conference on Litigating Catastrophically Injured Infant Cases, February 2002.
- Co-Author, “Hospital Joint Enterprise,” Association of Trial Lawyers of America National College of Advocacy Conference on Litigating Catastrophically Injured Infant Cases, February 2002.

REPORTED CASES

- In re Silica Products Liability Litigation, 166 S.W.3d 514 (Tex. J.P.M.L. 2004)
- In re Checking Account Overdraft Litigation, 718 F. Supp. 2d 1352 (S.D. Fla. 2010)
- In re Toyota Motor Corp., 754 F. Supp. 2d 1145 (C.D. Cal. 2010)
- General Fidelity Ins. Co. v. Foster, 808 F. Supp. 2d 1315 (S.D. Fla. 2011)
- Arrant v. Graphic Packaging International, Inc., No. 48,197-CA (La. Ct. App. Sept. 25, 2013)
- In re Easysaver Rewards Litigation, 921 F. Supp. 2d 1040 (S.D. Cal. 2013)
- Walker, et. al v. Gutierrez, 111 S.W.3d 56 (Tex. 2003).
- Emmett Barbe, Jr., et al. v. American Sugar Refining, Inc., Amstar Corporation, Amstar Sugar Corporation, Tate & Lyle North American Sugars, Inc., and Domino Sugar Company; Court of Appeal No. 2011-CA-0544;
- Peter Becker, Jr., et al v. Murphy Oil Corporation, Supreme Court of the State of Louisiana No. 2011-C-1750
- In re EasySaver Rewards Litigation, Case No. 09-CV-2094-MMA (BLM), United States District Court, S.D. California (August 13, 2010)
- Matter of Elbert Ford et. al. v. Pulmosan Safety Equipment Corp.; 52 AD 3d 710 - NY: Appellate Div., 2nd Dept. 2008